REMARKS

In the Office Action, the Examiner rejected the claims 27, 29, 35, 36, 40, 42, 43, 46, 50, and 52 as obvious over Wober in view of Yuan, and allowed claims 28, 30 - 34, 37 - 39, 41, 45, 47 - 49 and 51.

Allowed Claims

Applicants note with appreciation the allowance of the claims 28, 30 - 34, 37 - 39, 41, 44, 45, 47 - 49 and 51.

35 USC 103(a)

Applicants submit that even a combination of the teachings of the Wober and Yuan references does not teach or suggest the claimed invention. The Examiner argues that Wober discloses grouping picture elements to form image segments while leaving other picture elements ungrouped. The passages of the reference relied upon to support this argument relate to determining filter coefficients. The adders are adders which form the coefficient and to not operate to group picture elements to form image segments. Please see column 7, lines 51 – 60 of the Wober reference. The actual grouping of picture elements into image segments as disclosed in Wober calls for the overlapping of image segments without leaving any picture elements ungrouped. See column 4, lines 66 and 67 of the Wober reference in this regard.

Even if the process for determining filter coefficients as explained with reference to Figures 8 - 12 of Wober would be seen as grouping picture elements, in the context of Wober it would make no sense at all to encode these picture elements since they are used for forming the filter coefficients. Therefore, even if encoding is disclosed in Yuan and in Wober, there is no reason whatsoever why a person of skill in this art would encode the picture elements which are selected for determining filter coefficients.

As such, the claimed invention is a non-obvious improvement over combined teachings of Wober and Yuan. Applicant respectfully requests withdrawal of the section 103 rejection and allowance of the remaining claims.



Conclusion

Applicants respectfully request early reconsideration and allowance of the present application.

Respectfully submitted,

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CERTIFICATE OF MAILING

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